

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF LACY  
FEHRENBACH-MAROSFALVY  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION

NOTE ON MOTION CALENDAR:  
February 28, 2025 at 2:00 p.m.

1 I, Lacy Fehrenbach-Marosfalvy, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge and the records of the Washington State  
4 Department of Health to which I have access.

5 2. I am the Chief of Prevention, Safety, and Health at the Washington State  
6 Department of Health (DOH), a position I have held since January 2022. In this role, I serve as  
7 a member of DOH's executive leadership team, oversee the work of the Executive Office of  
8 Prevention, Safety and Health, set the strategic direction of the agency, ensure that we comply  
9 with all applicable federal and state laws and regulations, and, at the most basic level, work to  
10 protect and improve the health and well-being of all people in Washington state..

11 3. I have focused my career on shaping policies and implementing programs that  
12 address social and environmental factors that impact health outcomes and inequities so that all  
13 people, families, and communities can thrive. Before I began my current role, I served as Deputy  
14 Secretary of Health for COVID-19 response from June 2020 through January 2022. Prior to the  
15 pandemic, I served as Assistant Secretary of the Prevention and Community Health Division.  
16 Before coming to Washington State, I worked on national public health policy in  
17 Washington, DC. I have more than 15 years of public health management and leadership  
18 experience, working on an array of issues including health system reform, access to healthcare,  
19 child and family health, infectious disease, and chronic disease, injury and violence prevention,  
20 and environmental health. I have managed various grants and cooperative agreements issued by  
21 the federal government during my career, and over the past nine years, I provided oversight and  
22 strategic direction to several major sources of federal funding related to environmental health  
23 and safety, infectious disease, chronic disease prevention, injury and violence prevention, child  
24 and family health, and access to healthcare and social services received by the state of  
25 Washington. I hold a BS in Molecular and Cell Biology from Texas A&M University, a Master  
26 of Public Health from The George Washington University, and I am certified in public health.

4. The Washington State Department of Health is a recipient of many federal grants, including grants from the Centers for Disease Control and Prevention (CDC).

5. This federal funding is essential to the operation of numerous critical programs on which DOH and Washingtonians rely.

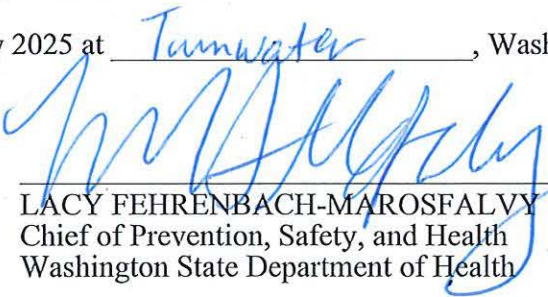
6. On January 31, 2025, the Washington State Department of Health received a notification from the CDC advising that “[t]o implement the Executive Order entitled *Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government* . . . you must immediately terminate, to the maximum extent, all programs, personnel, activities, or contracts promoting or inculcating gender ideology at every level and activity . . . that are supported with funds from this award,” and that “[a]ny vestige, remnant, or re-named piece of any gender ideology programs funded by the U.S. government under this award are immediately, completely, and permanently terminated.” A copy of that communication is attached hereto as Exhibit 1.

7. That message was later rescinded on February 11, 2025, as a result of a temporary order in other litigation. A copy of that communication is attached hereto as Exhibit 2.

8. It is highly disruptive and chaotic for our agency to receive defunding letters from the federal government. While we are thankful that the defunding letter was rescinded, our agency remains concerned that we may receive future defunding letters from the federal government.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 18<sup>th</sup> day of February 2025 at Tumwater, Washington.

  
 LACY FEHRENBACH-MAROSFALVY  
 Chief of Prevention, Safety, and Health  
 Washington State Department of Health